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January 20, 2015

## **BY ECF AND HAND**

Hon. Shira A. Scheindlin United States District Court for the Southern District of New York Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street New York, New York 10007

Re: Wultz v. Bank of China Ltd., No. 11-cv-01266 (SAS) (GWG)

Dear Judge Scheindlin:

We represent Plaintiffs in the above-referenced action. In accordance with Your Honor's instructions of December 23, 2014, we write to provide the Court with the materials required to submit the Court's previously-issued Letter of Request for International Judicial Assistance (Letter Rogatory) (Dkt. #708) to the Office of American Citizen Services of the U.S. Department of State, located at SA-17, 10th Floor, 2201 C Street NW, Washington, DC 20522-1710, for transmission to the Kingdom of Belgium via diplomatic channels.

Plaintiffs hereby confirm that the enclosed Letter Rogatory is identical to that previously agreed upon by the parties, approved by the Court and (along with certified translations) and submitted to the Ministry of Justice of the Kingdom of Belgium. We also enclose a certified check for the required consular fess of \$2,275.

In order to process letters rogatory through diplomatic channels, the Department of State requires a cover letter setting forth: (1) the name of the case; (2) the docket number; (3) the foreign country to which the request is directed; (4) the nature of the request; (5) the names and addresses of the persons from whom evidence is to be obtained; (6) the address of the U.S. court or attorney to which the executed letters rogatory should be returned; (7) a statement of responsibility for additional costs incurred (to be borne by Plaintiffs' counsel here); and (8) confirmation that the appropriate fee is enclosed. For the Court's convenience, Plaintiffs attach hereto as Exhibit A a draft cover letter for the Court's use that sets forth all of the aforementioned information.

Plaintiffs respectfully request that the Court dispatch the enclosed Letter Rogatory materials to the Office of American Citizen Services of the Department of State.

Respectfully yours,

Lee Wolosky

Enclosures (by hand)

cc: All Counsel